



MAY 27 2005

**SPECIAL 510(k) SUMMARY for the line extension of  
INION CPS™ Baby 1.5 Bioabsorbable Fixation System (K010351)**

**MANUFACTURER**

Inion Ltd., Lääkärintä 2, FIN-33520 Tampere, FINLAND

**Contact Person**

Hanna Marttila, Regulatory Affairs Director

Lääkärintä 2, FIN-33520 Tampere

Phone: +358 3 2306 600

Fax: +358 3 2306 691

hanna.marttila@inion.com

**DEVICE NAME**

Trade name: 40-hole plate, 64-hole plate

Common/Usual Name: Bone plate

**ESTABLISHMENT REGISTRATION NUMBER**

9710629

**DEVICE CLASSIFICATION AND PRODUCT CODE**

Classification Panel: Dental

Regulation Number: 21 CFR 872.4760

Regulation Name: Bone plate

Regulatory Class: Class II

Product Code: JEY

**PREDICATE DEVICE**

LactoSorb Trauma Plating System 1.5 38 hole plate (K992355, K971870)

**CONFORMANCE WITH PERFORMANCE STANDARDS**

No applicable mandatory performance standards exist for this device.

Compliance to voluntary consensus standards is listed in the application.

**THE REASON FOR SPECIAL 510(k)**

Additional plate designs to Inion CPS™ Baby 1.5 Bioabsorbable Fixation System (K010351).



## DEVICE DESCRIPTION AND PRINCIPLES OF OPERATION

The Inion CPS™ Baby 1.5 Bioabsorbable Fixation System is indicated for use in trauma and reconstructive procedures in the craniofacial skeleton, mid-face and maxilla. Specific indications:

- Fractures of the cranium, mid-face and maxilla
- Infant craniofacial surgery (i.e. craniosynostosis, congenital malformations)
- LeFort (I, II, III) osteotomies
- Pediatric reconstructive procedures
- Orthognathic or reconstructive procedures of the cranium, mid-face, or maxilla
- Craniotomy flap fixation.

The new 40-hole plate and 64-hole plate are identical with the other implants in the previously 510(k) cleared Inion CPS™ Baby 1.5 Bioabsorbable Fixation System (K010351) in terms of copolymer composition, intended use and indications for use as described in the device labelling, manufacturing method, sterilization method and packaging solution.

Similar design from other manufacturers is currently commercially available and in clinical use.

## EQUIVALENCE TO MARKETED PRODUCTS

Based on the performance data and specifications presented, it can be concluded that the intended use, material composition and scientific technology, degradation profile and mechanical properties of Inion CPS™ Baby 1.5 Bioabsorbable Fixation system 40 hole plate and 64 hole plate are substantially equivalent with the other Inion CPS™ Baby 1.5 Bioabsorbable Fixation system (K010351) implants as well as the predicate device LactoSorb Trauma Plating System 1.5 38 hole plate (K992355, K971870).

Inion CPS™ Baby 1.5 Bioabsorbable Fixation system 40 hole plate and 64 hole plate are substantially equivalent to predicate Class II devices used in maintaining accurate alignment of bone fractures and osteotomies in the cranium and mid-face because the differences between Inion CPS™ Baby 1.5 Bioabsorbable Fixation system 40 hole plate and 64 hole plate and the predicate devices do not raise new questions of safety and effectiveness.



Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

MAY 27 2005

Ms. Hanna Marttila  
Regulatory Affairs Director  
Inion Limited  
Lääkärintäti 2, FIN-33520 Tampere  
FINLAND

Re: K051341  
Trade/Device Name: Inion CPS™ Baby 1.5 Bioabsorbable Fixation System  
Regulation Number: 872.4760  
Regulation Name: Bone Plate  
Regulatory Class: II  
Product Code: JEY  
Dated: May 19, 2005  
Received: May 23, 2005

Dear Ms. Marttila:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (240) 276-0115. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/industry/support/index.html>.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Chiu Lin', with a stylized flourish at the end.

Chiu Lin, Ph.D.

Director

Division of Anesthesiology, General Hospital,

Infection Control and Dental Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

## Indications for Use

510(k) Number (if known): K051341

Device Name: Inion CPS™ Baby 1.5 Bioabsorbable Fixation System

Indications for Use:

- A. General indications: The **INION CPS™ BABY 1.5 BIOABSORBABLE FIXATION SYSTEM** is intended for use in trauma and reconstructive procedures in the craniofacial skeleton, mid-face and maxilla.
- B. Specific indications:
- Fractures of the cranium, mid-face and maxilla
  - Infant craniofacial surgery (i.e. craniosynostosis, congenital malformations)
  - LeFort (I, II, III) osteotomies
  - Pediatric reconstructive procedures
  - Orthognathic or reconstructive procedures of the cranium, mid-face, or maxilla
  - Craniotomy flap fixation

Contraindications:

The **INION CPS™ BABY 1.5 BIOABSORBABLE FIXATION SYSTEM** is not intended for use in and is contraindicated for mandibular tumor resection; active or potential infection; patient conditions including limited blood supply, insufficient quantity or quality of bone; and where patient cooperation cannot be guaranteed (e.g., alcoholism, drug abuse). DO NOT use in the mandible.

Prescription Use ✓  
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use \_\_\_\_\_  
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF  
NEEDED)

Concurrence of CDRH, Office of Device Evaluation (ODE)

  
(Division Sign-Off)  
Division of Anesthesiology, General Hospital,  
Infection Control, Dental Devices

510(k) Number: K051341